

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

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DEBRA R. HANKE, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

ANTONIO MARTINEZ
Full name and prison number of
plaintiff(s)

v.

THE MEDICAL STAFF
OF LEE COUNTY DETENTION
CENTER. (NURSE STEWART,
& DR LACY)
Name of person(s) who violated
your constitutional rights.
(List the names of all the persons))

CIVIL ACTION NO. 3:06cv257-MHT
(To be supplied by the Clerk of the
U.S. District Court)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? Yes () No (X)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? Yes () No (X)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:
Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county)

3. Docket No. _____

4. Name of Judge to whom case was assigned _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit _____

7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT LEE COUNTY CORRECTIONAL FACILITY 2311 Gateway Drive Opelika AL 36801

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED LEE COUNTY CORRECTIONAL CENTER

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

NAME

ADDRESS

1. NURSE STEWART P.O. Box 2407 Opelika, AL 36801, LDC
2. DR. LACY EAST ALABAMA MEDICAL CENTER EMERGENCY Room
3. _____
4. _____
5. _____
6. _____

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED January 25th, + February 8th, 2006, AND MARCH 14, 2006

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: I need an operation for a hernia, and I am being denied medical attention

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place, manner, and person involved).

ON 2/6/06, THE DOCTOR TOLD ME THAT I DIDN'T NEED SURGERY, AND THEN TOLD ME THAT AS SOON AS I GET OUT I NEED TO HAVE SURGERY. ON 3/14/06, THE DOCTOR LACY SAID THAT I COULDN'T GET THE SURGERY TILL I GET OUT OF GO TO PRISON

GROUND TWO: I have received no medication for pain

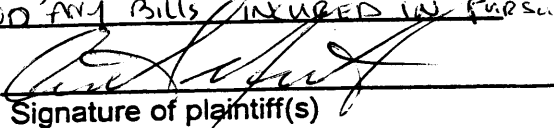
SUPPORTING FACTS: I have been told on several different occasions that I can have no medication, by nurse Stewart.

GROUND THREE: I have been moved from the medical dorm to General population

SUPPORTING FACTS: I was moved from the medical dorm on around the 2nd of February by Corporal Winters for no reason, EXCEPT THAT HE DOESN'T BELIEVE I HAVE A HEAVY-A

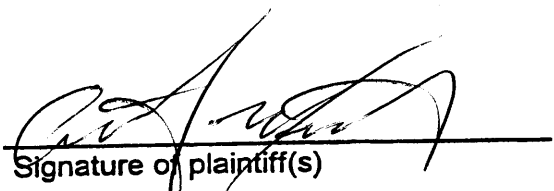
VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

To make it possible to get my operation AS SOON AS possible, and to have the ones who are violating my rights to pay for the bills, and have them reimburse me for pain & suffering, AND ANY BILLS INCURRED IN PURSUIT OF JUSTICE


Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on 2/16/06
(date)


Signature of plaintiff(s)

(3-)

DOCTOR THAT I WANT GET THE SURGERY FOR 2011

2/16/06

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~~RECEIVED~~ REQUESTS SENT OUT

#1. Need the names of the Nurse(s) & Doctor involved
& ADDRESS. ALSO DATE OF VISIT TO THE DOCTOR

Time, place, manner & person(s) involved

#3 Show Ledger Sheet showing last six months
transactions on 8"x11"

#

~~*~~ ON 3/4/06, I SENT A REQUEST OUT FOR THE NAMES
OF THE NURSE'S & DOCTORS, AGAIN, AND A REQUEST
TO GET A CERTIFIED STATEMENT OF MY ACCOUNT.
THE REQUEST'S SENT OUT EARLIER WERE NOT ANSWERED.
I ALSO REQUESTED A NOTARY PUBLIC.

~~*~~ *Christopher Latham*

I CERTIFY THIS IS TRUE AND CORRECT AND
WILL TESTIFY UNDER OATH AS A WITNESS

~~*~~ LOUIS CHRISTOPHER LATHAM
Louis C. Latham

DONE ON THIS 4TH DAY OF MARCH.

ON 3/14/06 AT 8:00 AM, I WAS TOLD BY THE
DOCTOR THAT I COULDN'T GET THE SURGERY FOR MY
HERNIA UNTIL I (a) GET OUT, OR (b) GO TO PRISON.